

*Association of
Lighting and Mercury
Recyclers*





Lamps with Mercury





The Mercury Lamp Problem

- ◆ We concur with Report findings re: air, water, land deposition pathways.
- ◆ Yet, studies have not been done on Hg in solid waste containers, human exposures from many job description requiring handling.
- ◆ These pathways are more important than migration in landfills.



Lamp Recycling Rates

Historically:

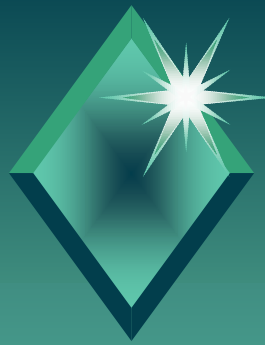
- ◆ 10-12% lamp recycling = 65-70,000,000 lamps
- ◆ 88% non-compliance and high cost of full compliance
- ◆ Current rate in CA approx. 20%

SF BAY TARGET TMDL

0.2 $\mu\text{g/g}$ (= ppm)



- ◆ Current DTSC threshold-
0.2 mg/l leachable and/or 20 ppm total
- ◆ Both contribute to TMDL
- ◆ Apples and Oranges, but any
mercury lamp exacerbates problem
(see Mercury Report, Table 1-4)



Impact of UWR on Lamp Recycling

After UWR-

- ◆ 80% increase in recycling from 1997 to present, due to outreach effort of ALMR
- ◆ EPA projects recycling compliance to go to 60-80%
- ◆ 420,000,000 lamps will need recycling
- ◆ less cost and regulatory burden for compliance



Why CA recycling rate is low

- ◆ California had an illegal policy which encouraged mercury lamps in garbage
- ◆ Multiple interpretations
- ◆ DTSC worked on regs for over 5 years
- ◆ Emergency regs 3/2000 still exempt large volumes of lamps



Some states with more stringent policies:

- ◆ MN- 0 lamps in landfill or incinerators
- ◆ FL- nothing over 10 lamps/mo
- ◆ 25 states with no CESQG exemptions
- ◆ NY- UW lamps <500#/shipment on HW manifest
- ◆ ME- all mercury lamps are prohibited from landfill by 7/2002
- ◆ CT- All lamps banned from landfill



Association activities

- ◆ Information on UWR implementation
- ◆ Technical resource
- ◆ Promotional materials
- ◆ Website:
www.almr.org
- ◆ Media outreach
- ◆ Speaking/seminars

For:

- ◆ Members
- ◆ Local Governments
- ◆ Solid Waste companies
- ◆ Franchising agencies
- ◆ Specifiers



Business Opportunities

- ◆ ESCOs
- ◆ ESCO vendors
- ◆ Contractors
 - ◆ Relamping
 - ◆ Demolition
 - ◆ HW Services
- ◆ Lighting Distributors
- ◆ HHWs
- ◆ Solid Waste Companies
- ◆ Anyone who wants to become a “Handler”



Policy Issues for 2001

- ◆ Hazardous threshold for mercury
- ◆ Use of TCLP, Total Hg or other indicators
- ◆ Land disposal ban for all mercury lamps
- ◆ Use of Drum Top Crushers
- ◆ Mobile crushing systems
- ◆ Conflicting ballast management policies



Association of Lighting and Mercury Recycler's Members

Members include: lamp processors, retorts and
equipment manufacturers

Operating in 21 states

Service provided from 39 locations in U.S.